

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

SHAMARA T. KING,
on behalf of herself and all others
similarly situated,

Plaintiff,

vs.

GENERAL INFORMATION
SERVICES, INC.

Defendant.

Civ. No. 10-6850

CLASS ACTION

NATALIE DOWELL, et al,
on behalf of herself and all others
similarly situated,

Plaintiff,

vs.

GENERAL INFORMATION
SERVICES, INC., et al

Defendants.

Civ. No. 14-3412

CLASS ACTION

MOTION TO PERMIT FILING UNDER SEAL

Plaintiffs Shamara T. King, Natalie Dowell and Lee Clark, by counsel, respectfully request that the Court enter the attached proposed Order permitting the filing under seal of certain documents relating to Plaintiffs' Motion for Final Approval of Class Action Settlement, and assigns the following reasons in support thereof.

1. Pursuant to the Court's order granting preliminary approval of the settlement agreement, the mutually agreed upon Settlement Administrator, McGladrey LLP, mailed the approved Class Notice to 53,705 individuals identified by Defendant as members of the Settlement Class. *See* Preliminary Approval Order, Doc. 107 at ¶ 8(b) and Exhibit C thereto.

2. The Class Notice informed Settlement Class Members, *inter alia*, of their right to exclude themselves from the class by submitting an Exclusion Request. *See Id.* at ¶ 12 and Exhibit C thereto.

3. To date, the Settlement Administrator has received 17 Exclusion Requests from Settlement Class members. *See* Affidavit of Risa Neiman of McGladrey LLP, Doc. 116 at ¶ 10.

4. The list of Exclusion Requests is attached to the Proposed Order Finally Approving the Class Action Settlement in this matter as Exhibit A.

5. Because the Settlement Class consists of persons who have been reported as having criminal records, sealing of the list of Exclusion Requests will protect the privacy of class members who have taken steps to remove themselves from this case.

6. Pursuant to Local Rule 5.1.5(a)(2), documents may be filed under seal only if the Court first enters an Order allowing the filing under seal.

WHEREFORE, Plaintiffs Shamara T. King, Natalie Dowell and Lee Clark respectfully request that this Honorable Court grant this Motion and enter an Order in the form proposed herewith, permitting Plaintiffs to file under seal documents identifying the class members who have filed Exclusion Requests in this case.

Dated: October 24, 2014

Respectfully submitted,

FRANCIS & MAILMAN, P.C.

By: /s/ James A. Francis
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Attorneys for Plaintiffs and the Class

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CLASS ACTION

[PROPOSED] ORDER ALLOWING FILING UNDER SEAL

This matter is before the Court on the Plaintiffs’ Motion to Permit Filing Under Seal of Exhibit A to the Proposed Final Approval Order filed with Plaintiffs’ Motion for Final Approval of Class Action Settlement. Upon consideration of this matter, the Court hereby ORDERS that the Motion is GRANTED.

IT IS SO ORDERED, this _____ day of _____, 2014.

HON. PETRESE B. TUCKER, U.S.D. J.

CERTIFICATE OF SERVICE

I hereby certify that on the date below, a true and correct copy of the foregoing was served via the Court's ECF Notification system upon all counsel of record.

Dated: October 24, 2014

s/ James A. Francis
James A. Francis